

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TENNESSEE
WESTERN DIVISION

SCOTT TURNAGE, CORTEZ D.)
BROWN, DEONTAE TATE, JEREMY S.)
MELTON, ISSACCA POWELL, KEITH)
BURGESS, and TRAVIS BOYD on behalf)
of themselves and all similarly situated)
persons,)

Plaintiffs,)

v.)

BILL OLDHAM, in his individual capacity)
and in his official capacity as the Sheriff of)
Shelby County, Tennessee; ROBERT)
MOORE, in his individual capacity and in)
his official capacity as the Jail Director of)
Shelby County, Tennessee; CHARLENE)
MCGHEE, in her individual capacity and)
in her official capacity as the Assistant)
Chief of Jail Security of Shelby County,)
Tennessee; DEBRA HAMMONS, in her)
individual capacity and in her official)
capacity as the Assistant Chief of Jail)
Programs of Shelby County, Tennessee;)
SHELBY COUNTY, TENNESSEE, a)
Tennessee municipality; and TYLER)
TECHNOLOGIES, INC., a foreign)
corporation,)

Defendants.)

Civil Action No.
2:16-cv-02907-SHM-tmp
Jury Demanded

**DEFENDANTS SHERIFF BILL OLDHAM, ROBERT MOORE, CHARLENE
MCGHEE, AND DEBRA HAMMONS' MOTION FOR PARTIAL JUDGMENT
ON THE PLEADINGS**

Defendants Sheriff Bill Oldham, Robert Moore, Charlene McGhee and Debra

Hammons move the Court to dismiss the claims and allegations against them in the Amended Consolidated Class Action Complaint for failure to state a claim pursuant Federal Rule of Civil Procedure 12(c) and in their individual capacities pursuant to qualified immunity. Defendants rely upon a memorandum in support of their Motion for Partial Judgment on the Pleadings submitted with this motion.

Therefore, Defendants Sheriff Bill Oldham, Robert Moore, Charlene McGhee and Debra Hammons move the Court to grant their Motion for Partial Judgment on the Pleadings and all other relief they are entitled.

Respectfully submitted,

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Certificate of Service

I certify that the foregoing is being filed via the Court's ECF system this 14th day of April, 2017, for service on all persons registered in connection with this case, including:

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